

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
AT HARRISBURG**

LOWER SUSQUEHANNA  
RIVERKEEPER ASSOCIATION,

Plaintiff,

v.

REPUBLIC SERVICES OF  
PENNSYLVANIA, LLC,

Defendant.

Civil Action No. 1:23-CV-00044-JPW

**MOTION *IN LIMINE*  
OF REPUBLIC SERVICES OF PENNSYLVANIA, LLC  
TO EXCLUDE PRE-JULY 2019 OSMOTIC PRESSURE VIOLATIONS**

Defendant Republic Services of Pennsylvania, LLC (“Republic”) moves to exclude evidence and testimony related to pre-July 2019 osmotic pressure effluent violations at trial. The reasons in support are fully set forth in the accompanying Memorandum of Law, which is incorporated herein.

WHEREFORE, Republic respectfully requests that the Court grant its motion and enter an Order precluding evidence and testimony related to the pre-July 2019 osmotic pressure effluent violations.

Dated: September 4, 2024

Respectfully Submitted,

/s/ P. Leigh Bausinger

Bonnie A. Barnett

P. Leigh Bausinger (*pro hac vice*)

Antoinette M. Snodgrass (*pro hac vice*)

FAEGRE DRINKER BIDDLE & REATH LLP

One Logan Square, Suite 2000

Philadelphia, PA 19103

Telephone: (215) 988-2700

Fax: (215) 988-2757

Email: [bonnie.barnett@faegredrinker.com](mailto:bonnie.barnett@faegredrinker.com)

Email: [leigh.bausinger@faegredrinker.com](mailto:leigh.bausinger@faegredrinker.com)

Email: [antoinette.snodgrass@faegredrinker.com](mailto:antoinette.snodgrass@faegredrinker.com)

*Attorneys for Defendant*

*Republic Services of Pennsylvania, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served upon Plaintiff the foregoing Motion *in Limine* of Republic Services of Pennsylvania, LLC to Exclude pre-July 2019 osmotic pressure effluent violations by causing it to be electronically filed and sending it via electronic mail to Plaintiff's attorneys:

Stephen G. Harvey  
Michael E. Gehring  
E. Kelly Conway  
Steve Harvey Law LLC  
1880 John F. Kennedy Blvd.  
Suite 1715  
Philadelphia, PA 19103  
steve@steveharveylaw.com

James M. Hecker  
Public Justice  
1620 L. Street, N.W. Suite 630  
Washington, D.C. 20036  
jhecker@publicjustice.net

*Attorneys for Plaintiff  
Lower Susquehanna Riverkeeper Association*

Dated: September 4, 2024

Respectfully Submitted,  
/s/ P. Leigh Bausinger

*Attorneys for Defendant  
Republic Services of Pennsylvania, LLC*